

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 DAVID R. CALLAWAY (CASBN 121782)
3 Chief, Criminal Division

4 DENISE MARIE BARTON (MABN 634052)
5 Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102-3495
8 Telephone: (415) 436-7200
9 FAX: (415) 436-7234
denise.barton@usdoj.gov

10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) CASE NO. CR 14-0648 VC
15 Plaintiff,)
16 v.) STIPULATION AND
17 DANIEL ROSENTHAL,) [PROPOSED] ORDER
18 Defendant.)
19 .)
20
21
22
23
24
25
26
27
28

The parties appeared before this Court on February 3, 2015 and scheduled a further appearance for March 9, 2015 at 2:00 p.m. The parties agree that the time from February 3, 2015 through March 9, 2015 is properly excluded to permit counsel to finalize a proposed protective order and thereafter for defense counsel to review discovery to be provided, pursuant to a protective order. For all these reasons, the parties agree and request that the Court enter an Order that time is properly excluded from February 3, 2015 through March 9, 2015 under the Speedy Trial Clock based on effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

Dated: February __, 2015

Respectfully submitted,

MELINDA HAAG
United States Attorney

DENISE MARIE BARTON
Assistant United States Attorney

ELIZABETH FALK
Attorney for Daniel Rosenthal

[PROPOSED] ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time from February 3, 2015 through March 9, 2015 would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from February 3, 2015 through March 9, 2015 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from February 3, 2015 through March 9, 2015 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

Dated: February 11, 2015

THE HON. VINCE CHHABRIA
United States District Court Judge